

James S. Ryder

July 12, 2006

Federal Trade Commission  
Office of the Secretary  
Room H-135 (Annex W)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Sir or Madam:

I am writing to express my concerns with the FTC's proposed Business Opportunity Rule - R511993.

In 1997 my wife was looking to lose some weight, to make this short she found Herbalife International and within a few years of hard work, we were making a very comfortable living. There are no words that I know of that can express to you how I feel about network marketing/direct selling. My family and friends, charities and foundations have ALL benefited because of what this has done for both me and my family.

This is a business for average people. It's simple and therefore it works. In fact its simplicity IS the business. Soccer moms, construction workers, mechanics, engineers, doctors, single moms, restaurant owners, Asians, Indians, African-Americans, Whites, Mexicans, Jews, gentiles, young, old, men, women, educated, non-educated, rich, poor, and EVERY kind of person living anywhere can and has succeed somewhere in Network Marketing. These are ordinary people, and what I can't understand is why you would put UNNECESSARY BURDENS on our sponsoring including but not limited to:

- ✓ Obtaining a written disclosure statement from Herbalife that would contain (among other things) the names and contact information for ten (10) prior purchasers who live closest to the prospective purchaser.
- ✓ We would then have to send this disclosure statement (as signed by the new person) to Herbalife, AND keep a copy or record of having done so for at least three (3) years.
- ✓ On top of that we would now have to wait seven (7) days before our new person would be allowed to sign the Distributor Application or make any payment related to the opportunity.

Take off YOUR business hat for a moment and put on OUR BUSINESS HAT. Do you think that that's fair to let's say a single mom who depends on her sales to put food on HER table? When I go to Wal-Mart, Target, or ANY OTHER

BUSINESS I CAN THINK OF I am not required such things. WOULD YOU BUY FROM A STORE THAT DID?

I didn't know the answer to this and would appreciate you helping me out...but if I were to open a Subway, McDonalds, Wendy's, Taco Bell or any other franchise, would I have to acquire all of this? If the answer is yes I would have to say that I agree since we're talking tens and in some cases hundreds of thousands of dollars. BUT these are ordinary people wanting an extraordinary life...not business people looking to invest \$800,000.00 in a chain of Kinko's.

Listen, as an entrepreneur I fully support your (the FTC) goals of stopping consumers from getting ripped off. That alone more than anything else hurts us enough and so YES let's take some positive steps towards solving this, BUT you most definitely need to take another HARD look at the proposed burdens you would be placing on legitimate, honest, hard-working people. All they want is their share of the pie...just like you and just like me. Keep it FAIR!

Sincerely,  
James S. Ryder